IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

FEDERAL TRADE COMMISSION, STATE OF CALIFORNIA, STATE OF COLORADO, STATE OF ILLINOIS, STATE OF INDIANA, STATE OF IOWA, STATE OF MINNESOTA. STATE OF NEBRASKA, STATE OF OREGON, STATE OF TENNESSEE, STATE OF TEXAS, STATE OF WASHINGTON, and STATE OF WISCONSIN,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG, SYNGENTA CORPORATION, SYNGENTA CROP PROTECTION, LLC, and

CORTEVA, INC.,

Defendants.

Civil Action No.: 1:22-cv-828

DEFENDANTS' JOINT CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' AMENDED COMPLAINT

Defendants Syngenta Crop Protection AG, Syngenta Corporation, Syngenta Crop Protection, LLC (together "Syngenta") and Corteva, Inc. ("Corteva") (collectively "Defendants") by and through their undersigned counsel and pursuant to Fed. R. Civ. P. 6(b), respectfully move the Court for a fourteen (14) day extension of time to respond to Plaintiffs' Amended Complaint in the above-referenced action to and including February 9, 2024.

In support of their motion, and as good cause, Defendants show the Court the following:

- 1. On January 12, 2024, the Court entered an Order denying Defendants' Motions to Dismiss Plaintiffs' Amended Complaint (Dkt. 160), making Defendants' Answers due on January 26, 2024, pursuant to Fed. R. Civ. P. 12(a)(4)(A).
- 2. Counsel for Defendants reasonably require additional time to prepare Answers on behalf of Defendants.
- 4. The undersigned counsel for Defendants consulted with Plaintiffs' counsel, and Plaintiffs' counsel has consented to a fourteen (14) day extension of time for Defendants to file their Answers through and including February 9, 2024.

WHEREFORE, Defendants Syngenta Crop Protection AG, Syngenta Corporation, Syngenta Crop Protection, LLC and Corteva, Inc. respectfully request that the Court enter an order extending their time to file Answers to Plaintiffs' Amended Complaint in the above-referenced action to and including February 9, 2024. A proposed order is submitted with this Motion.

This the 24th day of January 2024.

s/Patrick M. Kane

Patrick M. Kane N.C. Bar No. 36861 <u>pkane@foxrothschild.com</u>

FOX ROTHSCHILD LLP 230 N. Elm Street, Suite 1200

PO Box 21927 (27420) Greensboro, NC 27401

Telephone: 336.378.5200 Facsimile: 336.378.5400

Paul S. Mishkin*
paul.mishkin@davispolk.com
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, NY 10017
Telephone: (212) 450-4292

Facsimile: (212) 701-5292

Attorneys for Defendants Syngenta Crop Protection AG, Syngenta Corporation, and Syngenta Crop Protection, LLC

MCGUIREWOODS LLP

/s/ Mark E. Anderson

Mark E. Anderson (Bar No. 15764) manderson@mcguirewoods.com 501 Fayetteville Street, Suite 500 Raleigh, North Carolina 27601

Phone: 919.755.6600 Fax: 919.755.6699

^{*}Specially appearing under L.R. 83.1(d)

David R. Marriott** dmarriott@cravath.com Margaret T. Segall** msegall@cravath.com CRAVATH, SWAINE & MOORE LLP 825 Eighth Avenue New York, New York 10019 Telephone: (212) 474-1000

Facsimile: (212) 474-3700

**Specially appearing under L.R. 83.1(d)

Attorneys for Defendant Corteva, Inc